

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS

Civil Action Number 1:25 CV 00717 RP DH

PAMELA DESOMOV, aka PAMELA JOY DE SOMOV, aka PAM DE SOMOV, aka PAMELA DE SOMOV, aka PAMELA SOMOV, aka PAM DESOMOV, aka DEE SOMOV, aka DEE DE SOMOV, aka DEE DEE SOMOV, aka PAMELA SPENCER aka PAM SPENCER aka PAMELA JOY POLLACK, aka PAM POLLACK, aka PAMELA JOY WESTERLINE, aka PAM WESTERLINE, aka LAURENT GELBART, aka LAURIE GELBART, aka LAUREN DECKER, aka JUANITA NANCY SIMS, aka JUANITA SIMS, aka NANCY SIMS, aka CHRIS DE SOMOV, aka CHRISTINE DE SOMOV, aka CHRISSY DE SOMOV, aka CHRISTOPHER DE SOMOV, aka NICKY DESOMOV, aka NICOLE DE SOMOV, aka NICHOLAS DE SOMOV, aka PAMELA WRIGHT, aka PAM WRIGHT

Plaintiff

VS

Julie Barnes and Margaret Sano

Defendants

FILED

June 05, 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY: Christian Rodriguez
DEPUTY

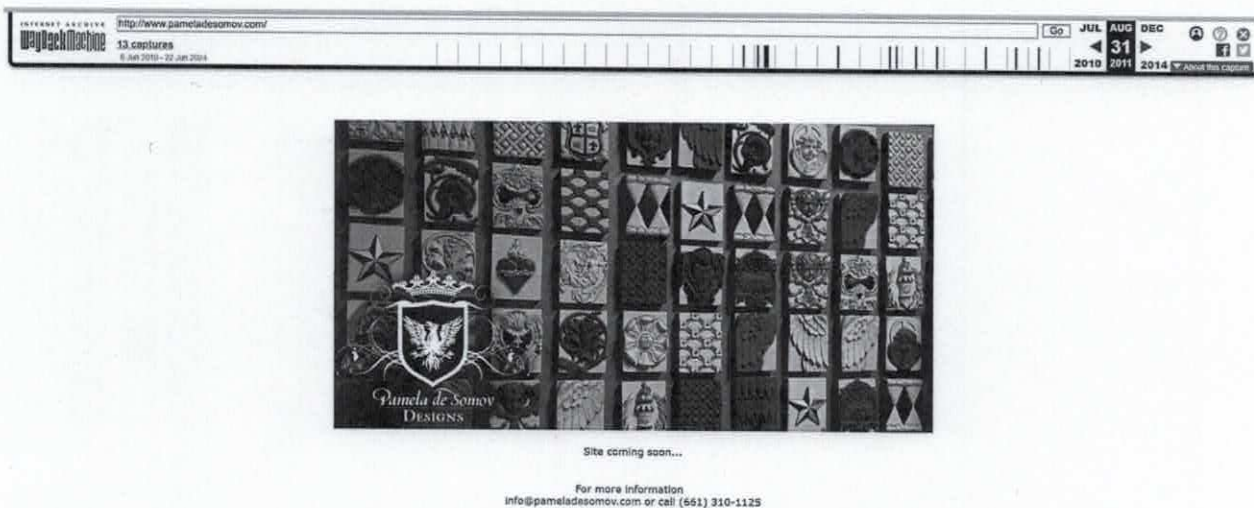
MOTION TO DENY PRELIMINARY INJUNCTION

Defendants Julie Barnes and Margaret Sano respectfully moves this Court to uphold 1st Amendment rights of freedom of speech and deny an injunction. All information on the website if factual and can be resources on the internet, The website has been in operation for eight years and its URL is owned by the defendants

The Rules of Civil Procedure do not apply in this case.

I BACKGROUND

Plaintiff wants to get back a domain that she had years ago, did nothing with the domain and let the domain go to the free market. The website domains were purchased in 2017 from the open market. Attached is a screen shot from 2011 of pameladesomov.com with a picture of copied art designs and a website coming soon. From 2012 there was no website to archive. As the Plaintiff did not publish a website since she was sued by Sid Dickens Designs.



The Plaintiff States the private and intimate personal details are on the website and blog. The website contains factual information that is the public domain and can be found on the internet. All pictures on the blog are from the internet.



Information

Name Pamela Desonov
Location Austin, TX
Age N/A years
Booking Date 12-04-2017

Booking Charges

3442-0 WARRANT ARREST NON TRAFFIC

[Get Detailed Information About This Arrest](#)

The above picture is from Mugshots online.

<https://www.mugshotsonline.com/texas/austin/pamela-desonov/208615872>



The above picture was from the Travis County Jail website 3/29/2018.

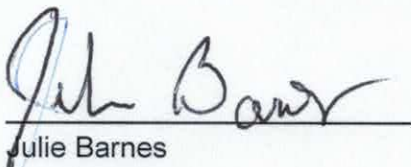


The above picture was from the Sid Dickens website, an artist message board about copied art. Please refer to Case No. CV12-07682 DSF (SSx) 05-09-2013 SID DICKENS, INC. Plaintiff, v. RODNEY F. DECKER, an individual, LAUREN P. GELBART an individual, and PAMELA JOY POLLACK, an individual, Defendants.

The plaintiff claims that employers were contacted in May 2023. *Sec. 16.002 ONE-YEAR LIMITATIONS PERIOD. (a) A person must bring suit for malicious prosecution, libel, slander, or breach of promise of marriage not later than one year after the day the cause of action accrues.*

The Plaintiff states that the publishing of defamatory content has resulted in lost employment. Reputational harm, and emotional distress. *To prove a successful defamation claim, the plaintiff must show the following: (1) the defendant published a false statement; (2) that defamed the plaintiff; (3) with the requisite degree of fault regarding the statement's truth; and (4) damages, unless the statement constitutes defamation per se. Bedford v. Spasoff, 520 S.W.3d 901, 904 (Tex. 2017)* All postings on <https://scammerpam.tumblr.com/> are republished from other websites, links are on the blog. The main websites are trellis and unicourt which has a reputation for truth and information is from court documents. *Sec. 73.002.(1) a fair, true, and impartial account of: (A) a judicial proceeding, unless the court has prohibited publication of a matter because in its judgment the interests of justice demand that the matter not be published;* Further the website has been active for eight years and did not prevent the plaintiff from becoming a mortgage broker and hired by at least two companies,

The plaintiff is a vexatious litigant and is using the courts and many police departments to bully, threaten and harass anyone that speaks the truth about her questionable business practices, and litigations (which are summarily dismissed).



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